IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 05-

v. : DATE FILED:

CHARLES NORTHEIMER : VIOLATIONS:

18 U.S.C. §1344 (bank fraud - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to the Information:

- 1. Defendant CHARLES NORTHEIMER was engaged in the business of buying properties in poor condition and rehabilitating them for resale.
- 2. Sovereign Bank, PNC Bank and Prudential Savings Bank were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.
- 3. Victim "LB" had bank accounts in her name at Sovereign Bank, PNC Bank and Prudential Savings Bank.
- 4. Bank statements and other financial correspondence were sent to victim LB at 1917 S. Broad Street, Philadelphia, Pennsylvania, even after LB had moved away and essentially abandoned the property.
- 5. Between in or about November 2000 and in or about April 2003, in the Eastern District of Pennsylvania, defendant

CHARLES NORTHEIMER

knowingly executed a scheme to defraud Sovereign Bank, PNC Bank and Prudential Savings

Bank and to obtain monies owned by and under the care, custody and control of these banks, by

means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

It was part of the scheme that:

- 6. On or about November 15, 2000, defendant CHARLES NORTHEIMER purchased at a Sheriff's sale a property located at 1917 S. Broad Street in Philadelphia, Pennsylvania. This property was formerly owned by victim LB and mail for LB continued to arrive at this address.
- 7. After taking possession of 1917 S. Broad Street in Philadelphia, defendant CHARLES NORTHEIMER kept and opened the mail addressed to LB. This mail included LB's bank and investment account statements.
- 8. Beginning on or about December 13, 2000, using information he obtained from LB's mail, defendant CHARLES NORTHEIMER began liquidating large investment accounts owned by LB, eventually causing a loss of approximately \$969,559.
- 9. Defendant CHARLES NORTHEIMER received checks addressed to LB, fraudulently endorsed these checks by forging LB's name, and then deposited the checks into LB's checking accounts at Sovereign Bank and Prudential Savings Bank.
- 10. From on or about December 13, 2000, through on or about April 1, 2003, defendant CHARLES NORTHEIMER withdrew approximately \$895,562.75 from LB's Sovereign Bank account by writing checks on which he forged LB's signature. These checks

were applied to various accounts owned and/or controlled by defendant NORTHEIMER and the money was used to pay his personal and business expenses.

- 11. On or about January 30, 2001, defendant CHARLES NORTHEIMER forged LB's signature on a letter to PNC Bank which requested that LB's money in the Ivy Growth Fund be transferred to a PNC money market account. Defendant NORTHEIMER also requested that checks be sent to the 1917 S. Broad Street address.
- 12. From on or about November 18, 2002, through on or about March 15, 2003, defendant CHARLES NORTHEIMER withdrew approximately \$48,255.93 from LB's PNC Bank account by writing checks on which he forged LB's signature. These checks were applied to various accounts owned and/or controlled by defendant NORTHEIMER and the money was used to pay his personal and business expenses.
- 13. From or about January 16, 2003, through on or about March 11, 2003, defendant CHARLES NORTHEIMER withdrew approximately \$25,849.41 from LB's Prudential Saving Bank account by writing checks, on which he forged LB's signature. These checks were applied to accounts owned and/or controlled by defendant NORTHEIMER and the money was used to pay his personal and business expenses.

All in violation of Title 18, United States Code, Section 1344.

PATRICK L. MEEHAN	
UNITED STATES ATTORNEY	